


 US DISTRICT JUDGE

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**IN RE: REALPAGE, INC., RENTAL
SOFTWARE ANTITRUST LITIGATION
(NO. II)**

Case No. 3:23-md-3071

MDL No. 3071

JURY DEMAND

Honorable Waverly D. Crenshaw, Jr.

This Document Relates to:

3:23-cv-00410

3:23-cv-00742

JOINT MOTION TO CONTINUE STAY OF DEADLINES AS TO CONTI

CONTI Texas Organization, Inc. d/b/a CONTI Capital (“CONTI”) is a defendant in this MDL and the above-captioned cases. On April 18, 2024, this Court entered an Agreed Scheduling Order (Dkt. 891) relating to CONTI’s Rule 12(b)(1) Motions to Dismiss. The Order set a May 17, 2024 deadline for CONTI to serve initial disclosures, a May 30 deadline for CONTI to file its Rule 12(b)(1) motions in both cases, and gave Plaintiffs 90 days from that date to conduct jurisdictional discovery and file responses. On May 16, 2024, the Court granted the parties’ Joint Motion to Stay Deadlines as to CONTI, and directed the parties to file an update within 90 days. (Dkt. 914.)

The parties have reached a settlement in the *Vincin* matter (3:23-cv-00410) of Plaintiff Vincin’s claims against CONTI. The parties accordingly intend to file appropriate papers addressing those claims. The parties are still in discussions about resolving Plaintiff Kabisch’s claims against CONTI. The parties agree that continuing the existing stay as to CONTI would (a) facilitate those discussions and best position the parties to reach an agreement; and (b) conserve party resources and serve the interest of judicial economy. For these reasons, Plaintiffs respectfully request that the Court continue the stay of all deadlines in the *Vincin* and *Kabisch* matters. Plaintiffs and CONTI would plan to provide another update to the Court within 60 days.